

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

**SECOND AMENDED MASTER  
SHORT FORM COMPLAINT FOR  
DAMAGES FOR INDIVIDUAL  
CLAIMS AND DEMAND FOR JURY  
TRIAL - (AMENDED)**

Plaintiff(s) named below, for their Complaint against Defendants named below, incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc. 364). Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:

Danus Bryson Chrisley

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of consortium claim:

Patricia Mclellan Chrisley

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

N/A

4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of implant:

South Carolina

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1 5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the  
2 time of injury:

3 Florida  
4

5 6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

6 Florida  
7

8 7. District Court and Division in which venue would be proper absent direct filing:

9 USDC, Middle District of Florida Court, Orlando Division  
10

11 8. Defendants (check Defendants against whom Complaint is made):

12 ☒ C.R. Bard, Inc.

13 ☒ Bard Peripheral Vascular, Inc.  
14

15 9. Basis of Jurisdiction:

16 ☒ Diversity of Citizenship

17 ☐ Other: \_\_\_\_\_  
18

19 a. Other allegations of jurisdiction and venue not expressed in Master  
20 Complaint:  
21

22 \_\_\_\_\_  
23 \_\_\_\_\_  
24 \_\_\_\_\_  
25

26 ///

27 ///

10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim

(Check applicable Inferior Vena Cava Filter(s)):

☐ Recovery® Vena Cava Filter

☒ G2® Vena Cava Filter

☐ G2® Express (G2®X) Vena Cava Filter

☐ Eclipse® Vena Cava Filter

☐ Meridian® Vena Cava Filter

☐ Denali® Vena Cava Filter

☐ Other: \_\_\_\_\_

11. Date of Implantation as to each product:

September 18, 2006

12. Counts in the Master Complaint brought by Plaintiff(s):

☒ Count I: Strict Products Liability - Manufacturing Defect

☒ Count II: Strict Products Liability - Information Defect (Failure to Warn)

☒ Count III: Strict Products Liability - Design Defect

☒ Count IV: Negligence - Design

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☐ Other(s): \_\_\_\_\_ (please state the facts

supporting this Count in the space immediately below)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

13. Jury Trial demanded for all issues so triable?

☒ Yes

☐ No

Respectfully submitted,  
THE NATIONS LAW FIRM

/s/ Howard L. Nations

Howard L. Nations  
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ATTORNEYS FOR PLAINTIFF(S)

I hereby certify that on this 24<sup>th</sup> day of February, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Howard L. Nations

Howard L. Nations